

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
IN CLERKS OFFICE

2004 SEP 30 P 2:16

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
LORRAINE J. MOTT, a/k/a )  
LORRAINE MOHAMED )  
Defendant. )

Crim. No. 04-

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
10310-WGY

18 U.S.C. § 371 (Conspiracy)

INFORMATION

COUNT ONE: 18 U.S.C. § 371 - Conspiracy

The United States Attorney charges that:

From a date unknown to the United States Attorney, but from not later than August 30, 1996, until July 19, 2004, at Boston, and elsewhere within the District of Massachusetts,

LORRAINE J. MOTT, a/k/a LORRAINE MOHAMED defendant herein, did unlawfully, willfully, and knowingly combine, conspire, confederate and agree with Samy G. Mohamed, to commit offenses against the United States, to wit: to enter into a marriage for the purpose of evading any purpose of the immigration laws, in violation of 8 U.S.C. § 1325(c).

OVERT ACTS

In furtherance of the conspiracy and to effect the objects thereof, the defendants committed the following overt acts, among others, in the District of Massachusetts, and elsewhere:

1. On or about August 30, 1996, less than two months after arriving in the United States, Mohamed claimed to have

married Mott, a United States citizen born in New Bedford, Massachusetts on December 15, 1939.

2. On or about September 27, 1996, Mott filed an I-130 Petition for Alien Relative with INS on behalf of Mohamed, as well as an I-485 Application to Register Permanent Residence or Adjust Status form which she filed jointly with Mohamed.
3. On or about January 13, 2000, Mott and Mohamed filed jointly with INS an I-751 Petition to Remove the Conditions on Mohamed's Residence.
4. Based on the I-751 application that Mott and Mohamed filed, they were purportedly living together at 365 Washington Avenue, Chelsea, Massachusetts. In fact, at the time, Mott was living at 147 Washington Street, Apt. 510, Lynn, Massachusetts.
5. On or about February 28, 2000, during an interview at 147 Washington Street, Apt. 510, Lynn, Massachusetts, Mott admitted that she had been separated from Mohamed for over one year and that she did not know his current whereabouts or how to contact him. Thereafter, Mott completed a withdrawal of her I-751 application that she filed jointly with Mohamed.
6. On or about March 2, 2000, Mohamed was found to be living at 365 Washington Street, Chelsea, with a female

who was later identified as Bouchra Goummih, born in Morocco on January 14, 1972.

7. On or about July 19, 2000, Mohamed appeared before the Immigration Court in Boston. Mott accompanied Mohamed, and Mohamed told the Immigration Judge that he had resolved his differences with Mott and that the couple was back together again.
8. On or about October 23, 2000, at 147 Washington Street, Lynn, Massachusetts, Mott acknowledged that she had not resided with Mohamed since prior to the last immigration hearing.
9. On or about May 16, 2001, Mott and Mohamed filed a second I-751 application with the former Immigration and Naturalization Service. In this application, Mohamed indicated that he had a son, Samy Mohamed Gamal, born on October 13, 2000. The birth certificate for Samy Mohamed Gamal lists Bouchra Goummih as the mother.
10. On or about April 16, 2004, Mohamed and Mott appeared at the Citizenship and Immigration Services (CIS) office in Boston, Massachusetts, for their I-751 interview. During his interview, Mohamed told the interviewing immigration officer that he resided at 8 Warren Street, Revere, Massachusetts with Mott since

September of 2003. In a separate interview the same day, Mott told the same immigration officer that she was residing at 67 Silsbee Street, Apartment 20, in Lynn, Massachusetts.

All in violation of Title 18, United States Code, section 371.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: 

GREGORY MOFFATT  
Assistant U.S. Attorney  
(617) 748-3370

DATED: September 30, 2004

**Criminal Case Cover Sheet****U.S. District Court - District of Massachusetts**Place of Offense: Boston Category No. III Investigating Agency FICEDOTTE

IN CLERKS OFFICE

City Boston Related Case Information:County Suffolk

Superseding Ind./ Inf. \_\_\_\_\_

2004 SEP 30 P 2:16

Same Defendant X

New Defendant \_\_\_\_\_

Magistrate Judge Case Number \_\_\_\_\_

04-M-865-MBD DISTRICT COURT

Search Warrant Case Number \_\_\_\_\_

DISTRICT OF MASS.

R 20/R 40 from District of \_\_\_\_\_

**Defendant Information:**Defendant Name Lorraine J. MOTT

Juvenile

☐ Yes☒ NoAlias Name Lorraine MOHAMEDAddress 67 Silsbee Street, Apt. 210, Lynn, MassachusettsBirth date (Year only): 1939 SSN (last 4 #): 8632 Sex F Race: Cauc. Nationality: U.S.A.Defense Counsel if known: Frances McIntyre, Esq.Address: 98 N. Washington StreetBoston, MA 02114

Bar Number: \_\_\_\_\_

**U.S. Attorney Information:**AUSA Gregory MoffattBar Number if applicable 558779Interpreter: ☐ Yes ☒ No


List language and/or dialect: \_\_\_\_\_

EnglishMatter to be SEALED: ☐ Yes ☒ No☐ Warrant Requested☒ Regular Process☐ In Custody**Location Status:**

Arrest Date: \_\_\_\_\_

☐ Already in Federal Custody as \_\_\_\_\_ in \_\_\_\_\_☐ Already in State Custody \_\_\_\_\_ ☐ Serving Sentence ☐ Awaiting Trial☒ On Pretrial Release: Ordered by Chief M.J. Bowler on July 20, 2004Charging Document: ☐ Complaint ☒ Information ☐ IndictmentTotal # of Counts: ☐ Petty \_\_\_\_\_ ☐ Misdemeanor \_\_\_\_\_ ☒ Felony 1

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☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: September 30, 2004Signature of AUSA: 

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District Court Case Number (To be filled in by deputy clerk): \_\_\_\_\_

Name of Defendant Lorraine J. MOTT

## U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. § 371</u>	<u>Conspiracy</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: